

EXHIBIT 2

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SWEETNAM STATEMENT OF FEES¹

DATE WORK PERFORMED	ATTORNEY	DESCRIPTION	HOURS BILLED	AMOUNT
1/27/2023	Sweetnam, D. Michael	Conference call with John Pearce, Andrea Marconi and Jason Coleman re: Kaish	0.8	\$360.00
1/27/2023	Coleman, Jason	Phone conversation with M. Sweetnam to prepare for conference call	0.1	\$32.50
1/27/2023	Coleman, Jason	Phone conversation with A. Marconi, J. Pearce, and M. Sweetnam to discuss case	0.8	\$260.00
2/9/2023	Sweetnam, D. Michael	Preliminary asset check on Bhamani in Georgia	1.0	\$450.00
3/6/2023	Sweetnam, D. Michael	Review and respond to emails from John Pearce; emails with Jason Coleman	1.0	\$450.00
3/7/2023	Sweetnam, D. Michael	Review material from John Pearce; call with Jason Coleman	0.9	\$405.00

¹ Block billing is sufficient if the description of the work performed is adequate. *See The N.E. Ohio Coalition for the Homeless v. Husted*, 831 F.3d 686, 705 n. 7 (6th Cir. 2016); *see also Smith v. Serv. Master Corp.*, 592 Fed.Appx. 363, 371 (6th Cir. 2014); *Pittsburgh & Conneaut Dock Co. v. Dir., Office of Workers' Comp. Programs*, 473 F.3d 253, 273 (6th Cir. 2007) (Moore, J., concurring in part and dissenting in part) (“[Plaintiff] has cited no authority to support its argument that the use of block billing is contrary to the award of a reasonable attorney fee ... and, in fact, our sister circuits have rejected block-billing objections to fee awards in a number of contexts.”).

3/8/2023	Sweetnam, D. Michael	File review in preparation for phone call; review email and eviction case analysis from Jason Coleman; call John Pearce; email John	1.1	\$495.00
3/13/2023	Sweetnam, D. Michael	Emails with John Pearce et al; file review; message Jason Coleman	0.4	\$180.00
3/13/2023	Coleman, Jason	Phone conversation with Chattanooga attorneys regarding local process and courts	0.7	\$227.50
3/15/2023	Sweetnam, D. Michael	Conference call with John Pearce, Andrea Marconi and Jason Coleman	1.0	\$450.00
3/15/2023	Coleman, Jason	Analyze documents, emails, and case law to prepare for call with A. Marconi and J. Pearce	0.5	\$162.50
3/15/2023	Coleman, Jason	Phone conversation with A. Marconi, J. Pearce, and M. Sweetnam to discuss case	1.0	\$325.00
11/28/2023	Sweetnam, D. Michael	Review and respond to emails from Fennemore	0.4	\$180.00
11/29/2023	Sweetnam, D. Michael	Initial review of final draft complaint and exhibits; emails with Jason Coleman	1.5	\$675.00

11/29/2023	Coleman, Jason	Revise complaint and correspond with M. Sweetnam concerning the same	1.0	\$325.00
12/1/2023	Sweetnam, D. Michael	Review materials forwarded by Andrea Marconi; emails with Jason Coleman; review Eastern District Tennessee Rules; call with Jason Coleman; email Andrea Marconi	1.8	\$810.00
12/1/2023	Coleman, Jason	Prepare for meeting with M. Sweetnam	0.5	\$162.50
12/1/2023	Coleman, Jason	Meeting with M. Sweetnam	0.5	\$162.50
12/1/2023	Coleman, Jason	Research into PHV process, including conversation with court clerk, and correspond with M. Sweetnam and A. Marconi concerning the same	0.3	\$97.50
12/4/2023	Sweetnam, D. Michael	Detailed review of complaint and exhibits; notes to file regarding same; emails with Jason Coleman; zoom call with Jason regarding complaint and revisions; internal attorney conference regarding	4.5	\$2,025.00

		service and related issues; call with Jason		
12/4/2023	Coleman, Jason	Meeting with M. Sweetnam to discuss complaint, service, and next step	0.8	\$260.00
12/4/2023	Coleman, Jason	Prepare complaint for filing and analyze service requirements	1.0	\$325.00
12/4/2023	Coleman, Jason	Analyze service options and correspond with J. Siegel and D. Fleming concerning the same	1.0	\$325.00
12/4/2023	Coleman, Jason	Prepare documents for filing, file complaint and pro hac vice motion for Andrea Marconi	1.2	\$390.00
12/4/2023	Coleman, Jason	Analyze service rules and prepare pro hac vice motion for M. Sweetnam	1.0	\$325.00
12/4/2023	Coleman, Jason	Draft Rule 7.1 disclosure statement and file the same; file pro hac vice motion for M. Sweetnam	1.3	\$422.50
12/5/2023	Sweetnam, D. Michael	Review and respond to emails from Jason Coleman with filed materials and costs; obtain certificate of good standing from Northern District Of	3.0	\$1,350.00

		Georgia; email same to Jason Coleman along with along with executed application to appear Pro Hac Vice; review process for obtaining filing credentials in Eastern District Of Tennessee		
12/6/2023	Sweetnam, D. Michael	Emails with Jason Coleman; review emails from Fennemore lawyers	0.5	\$225.00
12/13/2023	Sweetnam, D. Michael	Review and respond to email from Andrea Marconi; email Jason Coleman; call with Jason Coleman	0.8	\$360.00
4/13/2024	Sweetnam, D. Michael	Confer with Jason Coleman; email to John Pearce and Andrea Marconi	0.4	\$180.00
4/13/2024	Sweetnam, D. Michael	Review email from Andrea; reply to same	0.2	\$90.00
4/23/2024	Sweetnam, D. Michael	Detailed review of MFMDs and MTD; email Jason; email Andrea Marcon	1.5	\$675.00
4/23/2024	Sweetnam, D. Michael	Review email from Andrea Marconi; call with Jason Coleman; reply to Andrea Marconi	0.5	\$225.00

		regarding meet and confer		
5/5/2024	Sweetnam, D. Michael	Review and respond to email from Andrea Marconi; register for e filing in Eastern District of Tennessee; review local rules regarding initial disclosures	0.9	\$405.00
5/7/2024	Sweetnam, D. Michael	Review emails and 26(f) report; review Judge Varlan's procedures; respond to email from Andrea Marconi	0.7	\$315.00
5/7/2024	Sweetnam, D. Michael	Review email from Andrea Marconi; review counterclaim; email to all regarding likely minimum adequacy of same to survive a motion to dismiss	0.6	\$270.00
5/7/2024	Coleman, Jason	Analyze amended counterclaim	0.5	\$175.00
5/9/2024	Coleman, Jason	Correspondence with John Pearce, Andrea Marconi and Mike Sweetnam regarding magistrate consent	0.6	\$210.00
5/13/2024	Sweetnam, D. Michael	Review and respond to email from Andrea Marconi; follow up with	0.4	\$180.00

		Jason Coleman; review Defendants' initial disclosures		
5/13/2024	Coleman, Jason	Prepare and file Rule 26(f) report as well as joint motion for entry of Rule 502 order and proposed order	0.4	\$140.00
5/14/2024	Sweetnam, D. Michael	Review of Plaintiff's initial disclosures	0.4	\$180.00
5/17/2024	Coleman, Jason	Prepare and file notice of non consent to magistrate judge	0.3	\$105.00
5/20/2024	Sweetnam, D. Michael	Email litigation group concerning adequacy of avoidance; detailed review of counterclaim response; edit and comment on same; email all regarding no magistrate consent and filing of counterclaim reply	1.0	\$450.00
5/20/2024	Sweetnam, D. Michael	Call with Jason Coleman regarding local rules and avoidance; review and respond to email from Andrea Marconi; message Jason; review local rules	1.0	\$450.00
5/20/2024	Coleman, Jason	Analyze local rules and case law regarding	0.5	\$175.00

		avoidance and correspond with DMS regarding same		
5/21/2024	Sweetnam, D. Michael	Review email and final version of response to counterclaim; reply to Andrea's email	1.3	\$585.00
5/21/2024	Coleman, Jason	Prepare and file answer to counterclaim	0.2	\$70.00
6/12/2024	Sweetnam, D. Michael	Review email from Andrea Marconi concerning proposed early mediation	0.1	\$45.00
7/2/2024	Sweetnam, D. Michael	Review follow up email from Andrea Marconi concerning early mediation	0.1	\$45.00
7/10/2024	Sweetnam, D. Michael	Review of email and draft discovery requests to Defendants from Andrea Marconi	0.5	\$225.00
7/15/2024	Sweetnam, D. Michael	Review draft discovery requests; correspond with all counsel concerning same	0.8	\$280.00
7/16/2024	Sweetnam, D. Michael	Review emails between Jason Coleman and Andrea Marconi regarding discovery to Defendants	0.1	\$45.00
10/17/2024	Coleman, Jason	Correspond with local counsel and team	1.3	\$455.00

		regarding mediation		
12/9/2024	Coleman, Jason	Review email correspondence from A. Marconi concerning the mediation	0.1	\$35.00
12/10/2024	Coleman, Jason	Review email correspondence from L. Maasch concerning discovery deficiencies and mediation result	0.2	\$70.00
12/11/2024	Coleman, Jason	Review email correspondence from M. Sweetnam concerning discovery deficiencies and mediation result	0.1	\$35.00
12/15/2024	Coleman, Jason	Review deposition notices and correspond with A. Marconi L. Maasch and M. Sweetnam concerning the same	0.1	\$35.00
12/16/2024	Coleman, Jason	Correspond via email with A. Marconi L. Maasch and M. Sweetnam concerning the deposition notices	1.0	\$350.00
12/17/2024	Coleman, Jason	Review email correspondence from L. Maasch and defense counsel regarding discovery matters	0.5	\$175.00

1/7/2025	Coleman, Jason	Correspond via email with defense counsel A. Marconi, L. Maasch and M. Sweetnam concerning defense counsel's motion to withdraw	0.7	\$245.00
1/9/2025	Coleman, Jason	Review email from Court concerning defense counsel's motion to withdraw and potential hearing dates	0.2	\$70.00
1/9/2025	Coleman, Jason	Correspond via email with A. Marconi, L. Maasch and M. Sweetnam concerning defense counsel's motion to withdraw Phone call with L. Maasch concerning defense counsel's motion to withdraw	0.4	\$140.00
1/13/2025	Coleman, Jason	Correspond via email with Court, defense counsel with A. Marconi L. Maasch and M. Sweetnam concerning hearing regarding defense counsel 's motion to withdraw	0.7	\$245.00
1/24/2025	Coleman, Jason	Attend hearing on defense counsel's motion to withdraw	0.8	\$280.00

3/7/2025	Coleman, Jason	Review application for entry of default and correspond with A. Marconi L. Maasch and M. Sweetnam concerning its filing and required separate email to court clerk-finalize and file the same	1.3	\$455.00
3/7/2025	Coleman, Jason	Prepare proposed entry of default and certificate of service- email them to court clerk	0.5	\$175.00
3/13/2025	Coleman, Jason	Review certificate of service and proof of delivery from L. Maasch- file the same	0.5	\$175.00
3/25/2025	Coleman, Jason	Email correspondence with A. Marconi L. Maasch and M. Sweetnam concerning entry of default and motion to extend deadlines- draft and file same	1.5	\$525.00
3/28/2025	Coleman, Jason	Phone calls with clerk's office concerning entry of default Phone calls with judge's chambers concerning motion to extend deadlines; Email correspondence with A. Marconi L. Maasch and	0.8	\$280.00

		M. Sweetnam concerning entry of default and motion to extend deadlines		
4/29/2025	Sweetnam, D. Michael	File review; compile invoice for use in motion for attorney's fees; email Andrea Marconi	1.0	\$450.00
		TOTAL	55.1	\$21,682.50